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CHRISTINA LABAJO AND MARY YOON, on behalf of themselves and all others similarly situated

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

CHRISTINA LABAJO and MARY YOON, on behalf of themselves and all others similarly situated, Plaintiffs,	Case No. 5:17-cv-00412-AB-DTB **STIPULATION EXTENDING TIME TO RESPOND TO INITIAL COMPLAINT**

vs. VALEANT PHARMACEUTICALS INTERNATIONAL, INC. AND VALEANT PHARMACEUTICALS NORTH AMERICA, LLC, Defendants.	**[L.R. 8-3]** Complaint served: March 15, 2017 Current response date: April 26, 2017 New response date: May 3, 2017

Plaintiffs Christina Labajo and Mary Yoon, and Defendants Valeant Pharmaceuticals International, Inc. and Valeant Pharmaceuticals North America, LLC, stipulate and agree as follows:

WHEREAS, Plaintiffs served their Complaint on March 15, 2017, and Defendants' response to Plaintiffs' Complaint is currently due on April 26, 2017;

WHEREAS, pursuant to L.R. 8-3, the parties have agreed to extend Defendants' time to respond to the Complaint to May 3, 2017;

WHEREAS, Defendants intend to file a motion to dismiss for lack of subject-matter jurisdiction, which they contend will dispose of this matter in its entirety;

WHEREAS, to accommodate counsels' schedules and ensure adequate time for briefing on Defendants' anticipated motion, the parties have agreed to a briefing schedule on the anticipated motion;

NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE AS FOLLOWS:

1. Defendants shall file their motion to dismiss on or before May 3, 2017;
2. Plaintiffs shall file their opposition to the motion to dismiss on or before May 30, 2017; and
3. Defendants shall file their reply on or before June 5, 2017.

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4. The hearing on the motion will be on Monday, June 19, 2017, at 10:00 a.m., or as soon thereafter as the Court may allow.

IT IS SO STIPULATED.

Dated: April 26, 2017

FARELLA BRAUN + MARTEL LLP

By: */s/ Thomas Mayhew*
Thomas Mayhew

Attorneys for Defendants
VALEANT PHARMACEUTICALS INTERNATIONAL, INC. and VALEANT PHARMACEUTICALS NORTH AMERICA, LLC

Dated: April 26, 2017

BURSOR & FISHER, P.A.

By: */s/ Joel Smith*
Joel D. Smith

Attorneys for Plaintiffs
CHRISTINA LABAJO and MARY YOON

Signature Attestation

Pursuant to Civil Local Rule 5-4.3.4(i), I hereby attest that all other signatories listed, whose signatures are indicated by a conformed signature ("/s/"), and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: April 26, 2017

FARELLA BRAUN + MARTEL LLP

By: */s/ Thomas Mayhew*
Thomas Mayhew

Attorneys for Defendants
VALEANT PHARMACEUTICALS INTERNATIONAL, INC. and VALEANT PHARMACEUTICALS NORTH AMERICA, LLC